

Exhibit O



ST. JOHN'S
UNIVERSITY

Joshua S. Hurwit
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June 17, 2019

BY ELECTRONIC MAIL (Pete@eikenberryllaw.com)

Peter G. Eikenberry, Esq.
75 Maiden Lane, Room 402
New York, New York 11038

Re: [REDACTED]

Dear Mr. Eikenberry:

I write in response to your letter of June 12, 2019, which you also sent to St. John's University President Dr. Conrado Gempesaw. Please do not write to President Gempesaw. Professional ethics rules prohibit you from communicating with President Gempesaw, who is represented by me as counsel to the University.

You write in your letter that you are "puzzled that [I] have not returned [your] latest telephone call or email." However, your letter fails to indicate when you telephoned me or sent me an email, and I have no record of receiving either.

The federal Family Educational Rights & Privacy Act, 20 U.S.C. § 1232g *et seq.*, prohibit me from disclosing any information about [REDACTED]. However, we reject your mischaracterization of the matters involving Ms. [REDACTED].

Your letter alleges that "Mr. [REDACTED] has been threatened with bodily harm and was punched in the face by a female student," but fails to state the dates of these alleged incidents or the identities of the alleged persons involved. As the University has not been previously made aware of these alleged incidents, I will forward your letter to the University's Department of Public Safety for further handling.

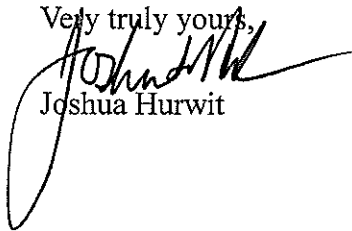
Your letter claims that it will be "impossible" for [REDACTED] to receive a fair hearing. We disagree. You offer no information that the individuals who will adjudicate the matter have knowledge of the tweet or the prior matter involving Mr. [REDACTED], or that even if these individuals had such knowledge, they would be unable to adjudicate the matter fairly and

impartially. In sum, your belief that Mr. [REDACTED] will not receive a fair hearing is based on speculation and conjecture.

The University will adjudicate Mr. [REDACTED]'s matter fairly and impartially based on the evidence developed during the investigation that you and Mr. [REDACTED] have reviewed.

Please call or write with any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Joshua Hurwit", is written over the typed name. The signature is stylized with a large loop at the end.

Joshua Hurwit